

START

0021084

February 16, 1990

Meeting Minutas
Special Topic: Work Plan Integration
450 Hills Street, Room 47, Richland Washington
February 14, 1990

From: J. D. Goodenough

To: Distribution:

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A.D. Krug, WHC
W. Johnson, WHC
M. Lauterbach, WHC
J. Patterson, WHC
S. Weiss, WHC
R. Carlson, WHC
S. Clark, WHC
D. Lacombe, PRC

Administrative Record File (100-HR-1, 100-HR-3, 100-DR-1, 100-BC-1,
100-BC-5, 300-FF-1, 300-FF-5) [Care of Susan Wray, WHC]

This meeting was a followup to the previous Special Topics meeting held on January 18, 1990. The purpose of this meeting was to discuss the specific application of the Ecology proposed approach to source/groundwater work plan integration to specific sets of work plans with a focus on the 100-H and 100-D areas.

Meeting minutes are comprised of the following:

- Attachment 1 - Meeting Summary/Summary of Commitments and Agreements
- Attachment 2 - Attendance List
- Attachment 3 - WHC's summary of the January 17, 1990 letter from Larry Goldstein, Ecology, to John Broderick, USDOE, "Ecology/EPA Position Paper on Operable Unit Work Plan Integration".



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Attachment 1

Meeting Summary/Summary of Commitments and Agreements
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*What is
OU
Investigation
Unit?*

1. General Strategy - Site investigations involving multiple source OUs within an aggregate groundwater OU should focus on the groundwater OU to provide data necessary to assess near term risk. Long term risk is to be assessed from data obtained in source OUs. Thus, the groundwater OU would be used to evaluate imminent endangerment for the aggregate area covered by groundwater OU. The investigations would:
 1. Address the primary source OU and groundwater OU concurrently
 2. Address in the groundwater OU:
 - Phase 1
 - a. Determine local and regional groundwater flow system
 - b. Investigate the most probable contributors to imminent endangerment (liquid disposal and "bad actor" solid waste sites)
 - c. Fill in the gaps in the data base describing the basic flow system
 - Phase 2
 - a. Perform subsequent assessment of identified contributors ("bad actors"); those sources posing imminent endangerment would be candidates for interim remedial actions; the remaining sources would be addressed in subsequent source OU investigations
 - b. Refine groundwater data for risk assessment
 3. At completion of groundwater OU phase 1, other source OUs within the aggregate groundwater OU would be evaluated for upgrading their investigation priority. This might include combining two or more operable units into a single work plan.
 4. Individual waste sites having contamination that poses imminent endangerment would be candidates for cleanup via interim remedial actions. Such actions would not constitute an emergency response, but rather only expedited response to be conducted within a 2-2 1/2 year time frame.

Agreement: As a goal, all of the OUs, both source and groundwater, within the groundwater OU aggregate area would be subject to a single

ROD.

Record of Decision

Action # ST6.1: DOE/WHC is to develop a strategy document which provides the details concerning integration of source and groundwater operable units. This strategy is to be based on the Feb. 14 Special Topics meeting and correspondence on the subject between Ecology and DOE.
Action: Mike Thompson by 3/2/90.

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Agreement: The TPA Milestone 13 would remain as written, but its intent would be achieved if operable unit work plans are combined. That is, each OU addressed counts as a delivered plan, even if OU plans are combined.

2. TSD vs. RCRA Past Practice - An issue was discussed regarding investigation of the NR area under TSD or under RCRA Past Practice authority [3004(u)].

Agreement: The NR work plans will be written in the same manner as HR-1, HR-3, and DR-1, i.e., RCRA Past Practice; Ecology programmatic comments will be incorporated during one of the review periods.

Action # ST6.2: DOE/WHC will meet internally to define a strategy for resolution of the TSD vs. RCRA Past Practice issue. A position paper will be developed and submitted to the regulatory agencies. Action: Merl Lauterbach

3. An issue was discussed regarding appropriate guidance for use in preparation of the RCRA Past Practice work plans, starting with the NR plans.

Agreement: The work plan guidance document will be written to provide a single direction for all future work plans, both RPP and CPP.

4. The impact of the new strategy on 300 Area work plans was discussed. It was agreed that the 300-FF-5 work plan would not be revised at this time. An addendum could be issued at a later date, if necessary.

Attachment 2

Attendance List
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NAME	ORGANIZATION	PHONE
D.A. Myers	GSSC/IT	376-0969
A.D. Krug	WHC	376-5634
D.R. Einan *	EPA	376-3883
D.R. Sherwood	EPA	376-9529
L. Goldstein	Ecology	(206) 438-7018
C. Cline	Ecology	(206) 438-7556
T. Wintczak *	WHC	376-0902
J. Broderick	DOE	376-4197
R. Stewart	DOE	376-6192
W. Johnson	WHC	376-1721
M. Lauterbach	WHC	376-5257
J. Patterson *	WHC	376-0568
W. Staubitz	USGS	(206) 593-6510
K.M. Thompson	DOE	376-6421
J.D. Goodenough	DOE	376-7087
G. Ballentine	PRC	(415) 543-4880
R. Pressantin	DOE	376-5983
L. Ames	PNL	376-2242
M. Hagood	WHC	376-9664
M.R. Adams *	WHC	376-8361
S. Weiss	WHC	376-1683
J. Chiaramonte	GSSC/IT	376-7829

* Part-time